

EXHIBIT 4

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MISSOURI

Oliver and Company, et al.,

Plaintiffs,

vs.

Dr. Ronald Zamber, Michael Cosby, Robert
Grenley, Visionary PE GP I, LLC, Visionary
Private Equity Group I, LP, and Visionary
Fund Manager, LLC,

Defendants.

CIVIL ACTION NO.

**DECLARATION OF MARION ABBOTT IN SUPPORT OF
PLAINTIFFS' MOTION FOR INJUNCTIVE RELIEF**

I, Marion Abbott, declare as follow:

1. My name is Marion Abbott.
2. I am over the age of 18 and have personal knowledge of the facts described herein. If called as a witness, I could and would testify competently and truthfully to these matters.
3. I am an investor with Visionary Private Equity Group.
4. I began investing with Visionary Private Equity Group in December, 2022, and the total of my investments with Visionary Private Equity Group and its affiliates is \$48,109.60.
5. I am dissatisfied with the management of Visionary Private Equity Group. My son, Adam Dufficy, has been the primary point of contact with VPEG and the Defendants relating to my investment. He has detailed in his declaration the issues with Defendants that have resulted in my concerns and this declaration.

6. Based on my own experience, and the information contained in the Complaint filed by Plaintiffs in this matter, I support the removal of Dr. Ronald Zamber, Robert Grenley, and Michael Cosby, from their respective positions at Visionary Private Equity Group.

7. I declare under penalty of perjury that the foregoing is true and correct.

Executed on: February 2nd, 2025



**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MISSOURI**

Oliver and Company, et al.,

Plaintiffs,

vs.

Dr. Ronald Zamber, Michael Cosby, Robert
Grenley, Visionary PE GP I, LLC, Visionary
Private Equity Group I, LP, and Visionary
Fund Manager, LLC,

Defendants.

CIVIL ACTION NO.

**DECLARATION OF BRIAN ANDRZEJEWSKI IN SUPPORT OF
PLAINTIFFS' MOTION FOR INJUNCTIVE RELIEF**

I, Brian Andrzejewski, declare as follow:

1. My name is Brian Andrzejewski.

2. I am over the age of 18 and have personal knowledge of the facts described herein. If called as a witness, I could and would testify competently and truthfully to these matters.

3. I am an investor with Visionary Private Equity Group.

4. I began investing with Visionary Private Equity Group in February 2015, and the total of my investments with Visionary Private Equity Group and its affiliates is \$750,000.00.

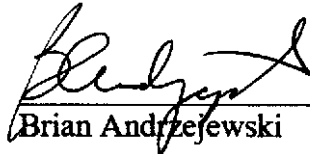
5. I am dissatisfied with the management of Visionary Private Equity Group, based on my own experience. Our investment started in early 2015, but after the first year or two after our initial investment, communication with the heads of the company was almost non-existent. Statements on return of investment and about critical timelines to purchase and when to expect distributions were always incorrect or never happened. We have never seen a statement in our investment in Navitas in which we were promised and 10% interest payment per year. We have never received that interest payment ever. Currently they have sold all the oil wells that were backing that investment and have tried to give us shares of stock in another company that does not even match our original investment,

never mind our interest payments. The folks at the top are not the people we need running this group. They need to be removed.

6. Based on my own experience, and the information contained in the Complaint filed by Plaintiffs in this matter, I support the removal of Dr. Ronald Zamber, Robert Grenley, and Michael Cosby, from their respective positions at Visionary Private Equity Group.

7. I declare under penalty of perjury that the foregoing is true and correct.

Executed on: February 6, 2025


Brian Andrzejewski

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MISSOURI

Oliver and Company, et al.,

Plaintiffs,

vs.

Dr. Ronald Zamber, Michael Cosby, Robert
Grenley, Visionary PE GP I, LLC, Visionary
Private Equity Group I, LP, and Visionary
Fund Manager, LLC,

Defendants.

CIVIL ACTION NO.

**DECLARATION OF THOMAS V BECK IN SUPPORT OF
PLAINTIFFS' MOTION FOR INJUNCTIVE RELIEF**

I, Thomas V Beck, declare as follow:

1. My name is Thomas V Beck.
2. I am over the age of 18 and have personal knowledge of the facts described herein. If called as a witness, I could and would testify competently and truthfully to these matters.
3. I am an investor with Visionary Private Equity Group.
4. I began investing with Visionary Private Equity Group in 2021, and the total of my investments with Visionary Private Equity Group and its affiliates is \$333,000.
5. I am dissatisfied with the management of Visionary Private Equity Group, based on my own experience with group investor calls, online meetings, emails and various executive summaries we were led to believe that on numerous occasions a "liquidity event" was within the very near future and the value of our investment was continually increasing.

6. Based on my own experience, and the information contained in the Complaint filed by Plaintiffs in this matter, I support the removal of Dr. Ronald Zamber, Robert Grenley, and Michael Cosby, from their respective positions at Visionary Private Equity Group.

7. I declare under penalty of perjury that the foregoing is true and correct.

Executed on: February 6, 2025

Thom V. Berk

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MISSOURI

Oliver and Company, et al.,

Plaintiffs,

vs.

Dr. Ronald Zamber, Michael Cosby, Robert
Grenley, Visionary PE GP I, LLC, Visionary
Private Equity Group I, LP, and Visionary
Fund Manager, LLC,

Defendants.

CIVIL ACTION NO.

**DECLARATION OF MATTHEW BECK IN SUPPORT OF
PLAINTIFFS' MOTION FOR INJUNCTIVE RELIEF**

I, Matthew Beck, declare as follow:

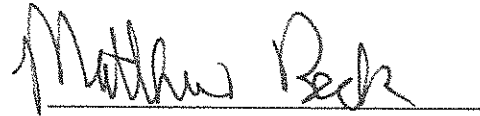
1. My name is Matthew Beck.
2. I am over the age of 18 and have personal knowledge of the facts described herein. If called as a witness, I could and would testify competently and truthfully to these matters.
3. I am an investor with Visionary Private Equity Group.
4. I began investing with Visionary Private Equity Group in 2021, and the total of my investments with Visionary Private Equity Group and its affiliates is \$60,000.
5. I am dissatisfied with the management of Visionary Private Equity Group, based on my own experience with the non-existent group investor information for the first 3 years of my participation. I have never met or spoken to Ron Zander or Michael Cosby, I have just been told from other investors that those gentlemen did not feel the need to communicate with individual small investors. I was told numerous times there would be

A liquidity event forthcoming but that never happened. Year end reports, Quarterly Reports, Verification of Invested Funds, Third Party Audits, Projections, and Timelines were NEVER distributed to me over the past 4 years.

6. Based on my own experience, and the information contained in the Complaint filed by Plaintiffs in this matter, I support the removal of Dr. Ronald Zamber, Robert Grenley, and Michael Cosby, from their respective positions at Visionary Private Equity Group.

7. I declare under penalty of perjury that the foregoing is true and correct.

Executed on: February 7, 2025

A handwritten signature in black ink, appearing to read "Matthew Beck", is written over a horizontal line.

Dr. Ronald Zamboni, Michael Cosby, Robert
Grenley, Visionary PE GP I, LLC, Visionary
Private Equity Group I, LP, and Visionary
Fund Manager, LLC,

Defendants.

CIVIL ACTION NO.

Filed: 03/07/25 Page: 10 of 86 PageID

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**DECLARATION OF JEFF BORAZ IN SUPPORT OF
PLAINTIFFS' MOTION FOR INJUNCTIVE RELIEF**

I, Jeff Boraz, declare as follow:

1. My name is Jeff Boraz.

2. I am over the age of 18 and have personal knowledge of the facts described herein. If called as a witness, I could and would testify competently and truthfully to these matters.

3. I am an investor with Visionary Private Equity Group.

4. I began investing with Visionary Private Equity Group in 2020, and the total of my investments with Visionary Private Equity Group and its affiliates is \$ 40,000.00.

5. I am dissatisfied with the management of Visionary Private Equity Group, based on my own experience. We have been told several times by David Barr that the fund was going great and that we should expect anywhere from 10x to 50x our money. We were told multiple times

throughout the years that we would be getting a check the following month and the payments never came. Time and time again we were lied to and were told the \$ had not come in.

6. Based on my own experience, and the information contained in the Complaint filed by Plaintiffs in this matter, I support the removal of Dr. Ronald Zamber, Robert Grenley, and Michael Cosby, from their respective positions at Visionary Private Equity Group.

7. I declare under penalty of perjury that the foregoing is true and correct.

Executed on: February 3, 2025

Jeff Boraz

A handwritten signature in black ink, appearing to read "Jeff Boraz", written over a horizontal line.

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MISSOURI

Oliver and Company, et al.,

Plaintiffs,

vs.

CIVIL ACTION NO.

Dr. Ronald Zamber, Michael Cosby, Robert
Grenley, Visionary PE GP I, LLC, Visionary
Private Equity Group I, LP, and Visionary Fund
Manager, LLC,

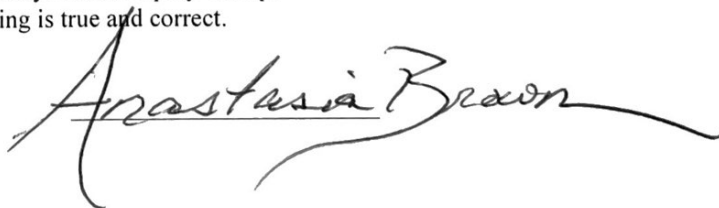
Defendants.

**DECLARATION OF ANASTASIA BROWN IN SUPPORT OF
PLAINTIFFS' MOTION FOR INJUNCTIVE RELIEF**

I, Anastasia Brown, declare as follow:

1. My name is Anastasia Brown.
2. I am over the age of 18 and have personal knowledge of the facts described herein. If called as a witness, I could and would testify competently and truthfully to these matters.
3. I am an investor with Visionary Private Equity Group.
4. I began investing with Visionary Private Equity Group in 2020, and the total of my investments with Visionary Private Equity Group and its affiliates is \$73,700.
5. I am dissatisfied with the management of Visionary Private Equity Group, based on my own experience. I previously served as a senior advisor, essentially a consultant, with Visionary Media Group ("Media"). In that role, I had regular communications with Ron Zamber about Media's failure to set or comply with a budget (Zamber stated that this was his responsibility). I raised questions to Zamber about large payments made by Media to various individuals that performed little if any work. Media's outside bookkeeper also raised questions about payments being reported by Zamber and Media and then quit its role rather than continue to work as Media's bookkeeper. Due to my prior role with Media, I continue to hear from other contractors or vendors for Media. In recent months, these contractors and vendors have told me that they are owed over \$300,000 by VPEG, and that they have quit or have stopped further work due to this non-payment.
6. Based on my own experience, and the information contained in the Complaint filed by Plaintiffs in this matter, I support the removal of Dr. Ronald Zamber, Robert Grenley, and Michael Cosby, from their respective positions at Visionary Private Equity Group.
7. I declare under penalty of perjury that the foregoing is true and correct.

Executed on: February 11, 2025



**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MISSOURI**

Oliver and Company, et al.,

Plaintiffs,

vs.

Dr. Ronald Zamber, Michael Cosby, Robert
Grenley, Visionary PE GP I, LLC, Visionary
Private Equity Group I, LP, and Visionary
Fund Manager, LLC,

Defendants.

CIVIL ACTION NO.

**DECLARATION OF TRACY COOPER IN SUPPORT OF
PLAINTIFFS' MOTION FOR INJUNCTIVE RELIEF**

I, Tracy Cooper, declare as follow:

1. My name is Tracy Cooper.
2. I am over the age of 18 and have personal knowledge of the facts described herein. If called as a witness, I could and would testify competently and truthfully to these matters.
3. I am an investor with Visionary Private Equity Group.
4. I began investing with Visionary Private Equity Group in 2020, and the total of my investments with Visionary Private Equity Group and its affiliates is approximately \$15,000.00.
5. I am dissatisfied with the management of Visionary Private Equity Group, based on my own experience. Specifically, there has been a lack of communication between VPEG and myself. Additionally, the messages to investors with respect to the closing of the fund seem to be

constantly changing. The fund was supposed to have closed the \$1.00 per share round but this round has never closed and any communication of putting additional funds in prior to the close was in my opinion never communicated clearly or timely.

6. Based on my own experience, and the information contained in the Complaint filed by Plaintiffs in this matter, I support the removal of Dr. Ronald Zamber, Robert Grenley, and Michael Cosby, from their respective positions at Visionary Private Equity Group.

7. I declare under penalty of perjury that the foregoing is true and correct.

Executed on: February 4, 2025



Tracy Cooper

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MISSOURI**

Oliver and Company, et al.,

Plaintiffs,

vs.

Dr. Ronald Zamber, Michael Cosby, Robert
Grenley, Visionary PE GP I, LLC, Visionary
Private Equity Group I, LP, and Visionary
Fund Manager, LLC,

Defendants.

CIVIL ACTION NO.

**DECLARATION OF MARK DALY IN SUPPORT OF
PLAINTIFFS' MOTION FOR INJUNCTIVE RELIEF**

I, Mark Daly, declare as follow:

1. My name is Mark Daly.
2. I am over the age of 18 and have personal knowledge of the facts described herein. If called as a witness, I could and would testify competently and truthfully to these matters.
3. I am an investor with Visionary Private Equity Group.
4. I began investing with Visionary Private Equity Group in February 2021, and the total of my investments with Visionary Private Equity Group and its affiliates is \$184,000.
5. I am dissatisfied with the management of Visionary Private Equity Group, based on my own experience. I am writing to express my dissatisfaction with my investment experience in VPEG 1. Since investing in 2021, I have encountered multiple unfulfilled projections and promises that have led to significant frustration and concern regarding the transparency and integrity of this investment.

Initially, I was assured that VPEG 1 would close that same year, leading to a price adjustment. However, despite the fund having not been closed, the price has remained unchanged, contradicting what was initially communicated. Furthermore, there has only been one payout, which covered merely half of the accrued interest, far from what was expected or indicated.

To add to these concerns, I learned that large investors were given highly favorable terms at approximately a buy two, get one free rate. This practice has left me feeling deceived, as it significantly dilutes the value of my investment and contradicts the fair treatment that all investors should receive.

Given the consistent pattern of overpromises and underdelivery, I am deeply disappointed in how this fund has been managed. I previously asked the fund managers to provide a clear and detailed response addressing these concerns, including:

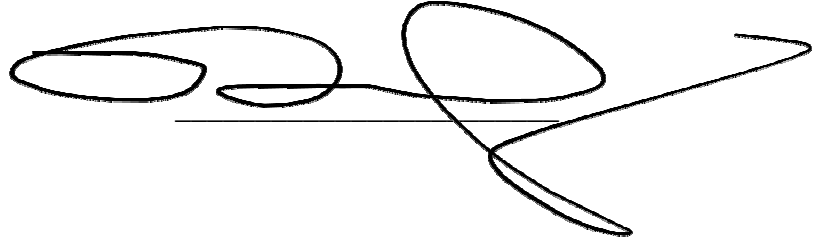
1. A transparent explanation for why the price has not changed despite the promise of the funds closure.
2. A breakdown of future payout expectations and a timeline for receiving the full accrued interest.
3. An explanation of the preferential terms granted to large investors and why such arrangements were made.
4. A firm commitment to improving communication and transparency moving forward.

I urged VPEG to provide a prompt response, as my confidence in this investment significantly eroded. No satisfactory clarification was given.

6. Based on my own experience, and the information contained in the Complaint filed by Plaintiffs in this matter, I support the removal of Dr. Ronald Zamber, Robert Grenley, and Michael Cosby, from their respective positions at Visionary Private Equity Group.

7. I declare under penalty of perjury that the foregoing is true and correct.

Executed on: February 7, 2025

A handwritten signature in black ink, consisting of several loops and a long horizontal stroke, positioned above a thin horizontal line.

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MISSOURI**

Oliver and Company, et al.,

Plaintiffs,

vs.

Dr. Ronald Zamber, Michael Cosby, Robert
Grenley, Visionary PE GP I, LLC, Visionary
Private Equity Group I, LP, and Visionary
Fund Manager, LLC,

Defendants.

CIVIL ACTION NO.

**DECLARATION OF WILLIAM DAVIDSON IN SUPPORT OF
PLAINTIFFS' MOTION FOR INJUNCTIVE RELIEF**

I, William Davidson, declare as follow:

1. My name is William Davidson.
2. I am over the age of 18 and have personal knowledge of the facts described herein. If called as a witness, I could and would testify competently and truthfully to these matters.
3. I am an investor with Visionary Private Equity Group.
4. I began investing with Visionary Private Equity Group in February 2021, and the total of my investments with Visionary Private Equity Group and its affiliates is \$10,000.
5. I am dissatisfied with the management of Visionary Private Equity Group, based on my own experience.
6. Based on my own experience, and the information contained in the Complaint filed by Plaintiffs in this matter, I support the removal of Dr. Ronald Zamber, Robert Grenley, and Michael Cosby, from their respective positions at Visionary Private Equity Group.

7. I declare under penalty of perjury that the foregoing is true and correct.

Executed on: February 13, 2025

s/ William Davidson

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MISSOURI

Oliver and Company, et al.,

Plaintiffs,

vs.

Dr. Ronald Zamber, Michael Cosby, Robert
Grenley, Visionary PE GP I, LLC, Visionary
Private Equity Group I, LP, and Visionary
Fund Manager, LLC,

Defendants.

CIVIL ACTION NO.

**DECLARATION OF ADAM DUFFICY IN SUPPORT OF
PLAINTIFFS' MOTION FOR INJUNCTIVE RELIEF**

I, Adam Dufficy, declare as follow:

1. My name is Adam Dufficy.
2. I am over the age of 18 and have personal knowledge of the facts described herein. If called as a witness, I could and would testify competently and truthfully to these matters.
3. I am an investor with Visionary Private Equity Group.
4. I began investing with Visionary Private Equity Group in April, 2021, and the total of my investments with Visionary Private Equity Group and its affiliates is \$133,687.67.
5. I am dissatisfied with the management of Visionary Private Equity Group, based on my own experience of Visionary Private Equity Group (VPEG), particularly based on my interactions with Rob Grinley and Mike Cosby. The VPEG has repeatedly failed to meet the investor payout deadlines as promised and when asked about why the deadlines were not met, Rob has given a multitude of excuses . Moreover, when I sought clarification on fundamental

aspects of VPEG's investment strategy he was unable to provide answers, which is concerning given his role as Director of Capital Development. He stated that if I wanted something in writing, I should wait for responses from their legal counsel, Mike Cosby. I sent numerous follow-up emails requesting updates and received excuses such as Mike had "emergencies" to tend to and "was out of the country". It ultimately took six months to receive a reply, which was disappointingly vague and consisted largely of generic responses. This experience reflects poorly on VPEG's commitment to transparency and accountability towards its investors.

6. Several times, I requested that Rob arrange a one-on-one meeting with Ron Zamber to discuss my frustrations with the VPEG. He assured me he would set it up, but he never did.

7. I've repeatedly asked Rob about the considerable investment in the media group and sought clarity on their strategy, but I've received no updates. Rob promised several times to provide me with this information, yet it never arrived. I'm certain that Ron Zamber is using new investor funds to support his aspiring lifestyle as a media mogul, which has been financed by both new and existing investors.

8. I've observed VPEG's use of predatory manipulation of information to encourage further investment. They urged my family and I to "get in soon," claiming the fund is about to close and that the new fund will be valued at \$1.50 per share, a promised 50% increase. In their yearly investor updates, they highlight past exits and recycle this same information to lure new investors. While there have been small exits in the past, they fail to annotate when these actually occurred in their yearly investor updates, giving the false impression of frequent and recent exits. In reality, there have been no significant exits for years, and this manipulation of information is unquestionably predatory.

9. I recently discovered that VPEG is raising new funds with a 50% bonus, meaning that for every new dollar invested, one receives 1.5 units, compared to the \$1.00 per unit that my family and I, along with hundreds of other investors, were offered. When I brought this up with Rob, he seemed shocked that I knew about it and eventually admitted, in a shaky voice, "Well, we should have sent notice out to all investors. Let me look into this and get back to you." Unsurprisingly, he never followed up. Offering new investors a 50% bonus significantly dilutes the fund as a whole, and the fact that the VPEG management team didn't inform all existing investors about these bonuses clearly suggests that Ron, Rob, Mike, and others involved are trying to attract new funds to cover old debts. This move likely constitutes a serious breach of the VPEG limited partnership agreement.

10. Investors are promised an 8% return on their investments, but my family and I have never received any returns since becoming limited partners in VPEG. I've heard that funds have come in from investments, yet none have been distributed to investors.

11. I'm aware that Ron Zamber is paying exorbitant "advisor fees" ranging from \$10,000 to \$20,000 per month to friends and associates in the media industry to maintain his image as a media mogul. Meanwhile, the 1099 contractors working for him at the fund are owed hundreds of thousands of dollars in back payments. This disparity highlights the problematic priorities within the organization.

12. I firmly believe that VPEG, particularly Rob Grinley and Rob Zamber, engages in predatory investment tactics. They consistently resort to bringing in new funds to cover old debts, demonstrating a troubling cycle of financial mismanagement. Their actions seem designed to enrich themselves, their friends, their families and their lifestyles at the expense of dedicated investors like my family and I. This level of mismanagement and manipulation is unacceptable,

and it raises serious concerns about the integrity and ethical standards within VPEG's leadership. It's infuriating to see how they prioritize their own interests over those of the investors who trusted them.

13. Based on my own experience, and the information contained in the Complaint filed by Plaintiffs in this matter, I support the removal of Dr. Ronald Zamber, Robert Grenley, and Michael Cosby, from their respective positions at Visionary Private Equity Group.

14. I declare under penalty of perjury that the foregoing is true and correct.

Executed on: February 2nd, 2025



IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MISSOURI

Oliver and Company, et al.,

Plaintiffs,

vs.

Dr. Ronald Zamber, Michael Cosby, Robert
Grenley, Visionary PE GP I, LLC, Visionary
Private Equity Group I, LP, and Visionary
Fund Manager, LLC,

Defendants.

CIVIL ACTION NO.

**DECLARATION OF ESSEX RESIDENTIAL MORTGAGE C/O THOMAS V BECK IN
SUPPORT OF
PLAINTIFFS' MOTION FOR INJUNCTIVE RELIEF**

I, Thomas V Beck, declare as follow:

1. My name is Essex Residential Mortgage c/o Thomas V Beck.
2. I am over the age of 18 and have personal knowledge of the facts described herein. If called as a witness, I could and would testify competently and truthfully to these matters.
3. I am an investor with Visionary Private Equity Group.
4. I began investing with Visionary Private Equity Group in 2021, and the total of my investments with Visionary Private Equity Group and its affiliates is \$50,000.
5. I am dissatisfied with the management of Visionary Private Equity Group, based on my own experience with group investor calls, online meetings, emails and various executive summaries we were led to believe that on numerous occasions a "liquidity event" was within the very near future and the value of our investment was continually increasing.

6. Based on my own experience, and the information contained in the Complaint filed by Plaintiffs in this matter, I support the removal of Dr. Ronald Zamber, Robert Grenley, and Michael Cosby, from their respective positions at Visionary Private Equity Group.

7. I declare under penalty of perjury that the foregoing is true and correct.

Executed on: February 6, 2025

ESSEX RESIDENTIAL MORTGAGE

John V. Berk

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MISSOURI

Oliver and Company, et al.,

Plaintiffs,

vs.

Dr. Ronald Zamber, Michael Cosby, Robert
Grenley, Visionary PE GP I, LLC, Visionary
Private Equity Group I, LP, and Visionary
Fund Manager, LLC,

Defendants.

CIVIL ACTION NO.

**DECLARATION OF EDWARD GETTEMEIER IN SUPPORT OF
PLAINTIFFS' MOTION FOR INJUNCTIVE RELIEF**

I, Edward Gettemeier, declare as follow:

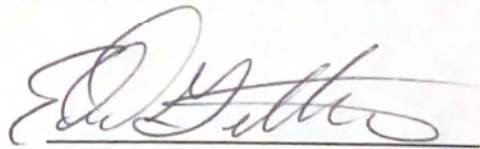
1. My name is Edward Gettemeier.
2. I am over the age of 18 and have personal knowledge of the facts described herein. If called as a witness, I could and would testify competently and truthfully to these matters.
3. I am an investor with Visionary Private Equity Group.
4. I began investing with Visionary Private Equity Group in 2020, and the total of my investments along with my spouse Pam Gettemeier with Visionary Private Equity Group and its affiliates is \$138,025.
5. I am dissatisfied with the management of Visionary Private Equity Group, based on my own experience and information. When my wife and I invested, we were told there was a specific window in which the \$1 per share would expire expressing urgency in placing an investment in the fund. Four years later shares are still being solicited at \$1 and according to information shared

on a recent call with Rob Grenley, even a discount of less than \$1 (information provided by Rob Grenley on update calls with myself and my friends who I recruited to invest in the fund). I have received multiple projection documents created by Rob Grenley as recently as this past Friday, January 31st. I have been consistently disappointed by unfulfilled promises of providing evidence of our portfolio holdings. VPEG has consistently made promises there would be open communication, regular updates on the growth of the portfolio, consistent annual reports indicating both the Mark to Market and Fair Market Value of the fund. To date these promised documents and communications have been extremely inconsistent and vague.

6. Based on my own experience, and the information contained in the Complaint filed by Plaintiffs in this matter, I support the removal of Dr. Ronald Zamber, Robert Grenley, and Michael Cosby, from their respective positions at Visionary Private Equity Group.

7. I declare under penalty of perjury that the foregoing is true and correct.

Executed on: February 6, 2025



**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MISSOURI**

Oliver and Company, et al.,

Plaintiffs,

vs.

Dr. Ronald Zamber, Michael Cosby, Robert
Grenley, Visionary PE GP I, LLC, Visionary
Private Equity Group I, LP, and Visionary
Fund Manager, LLC,

Defendants.

CIVIL ACTION NO.

**DECLARATION OF CATHERINE L. GIACIN IN SUPPORT OF
PLAINTIFFS' MOTION FOR INJUNCTIVE RELIEF**

I, Catherine L. Giacin, declare as follow:

1. My name is Catherine L. Giacin.
2. I am over the age of 18 and have personal knowledge of the facts described herein. If called as a witness, I could and would testify competently and truthfully to these matters.
3. I am an investor with Visionary Private Equity Group.
4. I began investing with Visionary Private Equity Group in 2016, and the total of my investments with Visionary Private Equity Group and its affiliates is \$64,542.00.
5. I am dissatisfied with the management of Visionary Private Equity Group, based on my own experience with what has been communicated to me personally by VPEG officers and management as well as my husband, Steven J. Giacin. I am in agreement with all comments Steven provided in his declaration below:

“Through my nine years as an investor in VPEG, the communication has always been slow. As a group that has many non-accredited investors, my initial thought was that VPEG

was just being careful in what they communicated because a lot of their investors could not handle the volatility in information.

As time went on, the communication started to be very erratic, and it seemed like VPEG was constantly moving from one hot opportunity to the next big thing and portraying to the investors that a payday was eminent by doing this. There have been no less than 5 or 6 times since 2016 that we were informed that others would be investing or adding money because the \$1.00 per share opportunity was closing down. This never happened and as of recently VPEG was allowing new investors to come in at the same \$1.00 per share yet gifting them bonus shares for doing so. This shows a pattern of mismanagement in always needing to raise funds at any cost by diluting the shares for all investors. Also important to note here, VPEG has not hit any self-proclaimed dates or timelines that they stated would happen during my time as an investor.

Before 2021, Brigitte had or could get reasonable answers and had oversight internally to bank accounts, money that came in, admin and staff expenses, etc. She could tell me how much money was in the escrow account that could not be touched as it was accumulating to be disbursed to the shareholders. Since 2021, Brigitte was removed from all the accounts and forced to receive information to communicate to investors through Mike Cosby and Rob Grenley instead of directly from Ron Zamber.

This is where I started noticing the serious inconsistency in information provided. Ron Zamber stopped paying Brigitte and her Investor Relations group and basically told them all he was done with them. Anyone who would do that lacks the integrity needed for me to trust them with my investment. I started asking a lot of questions, had several calls with Grenley and other investors where I caught him lying consistently based on information I already had or knew to be factual. In shareholder meetings that I set up for a group of investors with VPEG officers and management staff in February of 2022 and May of 2023, many questions were collectively asked of when they anticipated moving to Fund 2, when we would be receiving the balance of accrued interest and what was the delay in disbursing funds that had been public knowledge that closed already. We never received answers to these questions.

As a Navitus investor as well, I have been asking for statements showing my principal and accrued interest for over 3 years, I have yet to receive anything. After the Victory/H2EG merger, I became more relentless in trying to secure this information as well as how many shares each Navitus owner would receive for the merger and when we could expect to be paid out our accrued interest. Brigitte reached out to Grenley and Cosby several times and received nothing but the runaround.

After speaking with several of the other larger investors in VPEG, I found most had the same opinion/consensus that I had. I then decided to reach out to Jim Hart of the Oliver Family to see what he thought based on them being the largest shareholder in VPEG. Jim had some of the same opinions, yet he said he thought the portfolio companies were strong. I asked if he had other information regarding that or was, he solely relying on what he had been told by Ron Zamber, he confirmed it was based on what he had been told by Ron. I then shared some of my experiences and the whole Navitus situation to let him know that he could not rely on anything

Ron told him. Over a short period of time, he started to dig deeper and found the discrepancies and inconsistencies in communication to be unacceptable as well.

This is when I decided that I was out, I contacted Mike Cosby and demanded my principal investment and accrued interest to be returned and that if VPEG did not accommodate I was going to engage with Matt Kitzi to legally seek redemption at a higher amount plus my legal fees to do so. I knew Matt had represented some previous investors who sought and received redemptions in 2023.

In typical VPEG fashion my demand was ignored, and I did in fact engage Matt Kitzi to seek redemption and Cosby agreed to a higher amount than I proposed initially. I had been negotiating the redemption demand right up to the point that this lawsuit was filed.

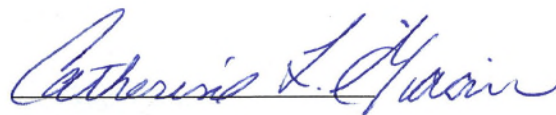
After Matt Kitzi sent the initial demand letter to VPEG/Mike Cosby and I read the information included, I then told Jim that I was seeking a redemption demand and had engaged Matt Kitzi as he had represented some prior LP's in achieving redemption demands. I suggested to Jim that his attorney may want to have a discussion with Matt for his own protection."

I have \$9,146 in VPEG through an IRA, and \$55,396 jointly with my husband in cash in VPEG.

6. Based on my own experience, and the information contained in the Complaint filed by Plaintiffs in this matter, I support the removal of Dr. Ronald Zamber, Robert Grenley, and Michael Cosby, from their respective positions at Visionary Private Equity Group.

7. I declare under penalty of perjury that the foregoing is true and correct.

Executed on: February 2, 2025



**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MISSOURI**

Oliver and Company, et al.,

Plaintiffs,

vs.

Dr. Ronald Zamber, Michael Cosby, Robert
Grenley, Visionary PE GP I, LLC, Visionary
Private Equity Group I, LP, and Visionary
Fund Manager, LLC,

Defendants.

CIVIL ACTION NO.

**DECLARATION OF STEVEN J. GIACIN IN SUPPORT OF
PLAINTIFFS' MOTION FOR INJUNCTIVE RELIEF**

I, Steven J. Giacin, declare as follow:

1. My name is Steven J. Giacin.
2. I am over the age of 18 and have personal knowledge of the facts described herein. If called as a witness, I could and would testify competently and truthfully to these matters.
3. I am an investor with Visionary Private Equity Group.
4. I began investing with Visionary Private Equity Group in 2016, and the total of my investments with Visionary Private Equity Group and its affiliates is \$575,783.00.
5. I am dissatisfied with the management of Visionary Private Equity Group, based on my own experience through my nine years as an investor in VPEG, the communication has always been slow. As a group that has many non-accredited investors, my initial thought was that VPEG was just being careful in what they communicated because a lot of their investors could not handle the volatility in information.

As time went on, the communication started to be very erratic, and it seemed like VPEG was constantly moving from one hot opportunity to the next big thing and portraying to the investors that a payday was eminent by doing this. There have been no less than 5 or 6 times since 2016 that we were informed that others would be investing or adding money because the

\$1.00 per share opportunity was closing down. This never happened and as of recently VPEG was allowing new investors to come in at the same \$1.00 per share yet gifting them bonus shares for doing so. This shows a pattern of mismanagement in always needing to raise funds at any cost by diluting the shares for all investors. Also important to note here, VPEG has not hit any self-proclaimed dates or timelines that they stated would happen during my time as an investor.

Before 2021, Brigitte had or could get reasonable answers and had oversight internally to bank accounts, money that came in, admin and staff expenses, etc. She could tell me how much money was in the escrow account that could not be touched as it was accumulating to be disbursed to the shareholders. Since 2021, Brigitte was removed from all the accounts and forced to receive information to communicate to investors through Mike Cosby and Rob Grenley instead of directly from Ron Zamber.

This is where I started noticing the serious inconsistency in information provided. Ron Zamber stopped paying Brigitte and her Investor Relations group and basically told them all he was done with them. Anyone who would do that lacks the integrity needed for me to trust them with my investment. I started asking a lot of questions, had several calls with Grenley and other investors where I caught him lying consistently based on information I already had or knew to be factual. In shareholder meetings that I set up for a group of investors with VPEG officers and management staff in February of 2022 and May of 2023, many questions were collectively asked of when they anticipated moving to Fund 2, when we would be receiving the balance of accrued interest and what was the delay in disbursing funds that had been public knowledge that closed already. We never received answers to these questions.

As a Navitus investor as well, I have been asking for statements showing my principal and accrued interest for over 3 years, I have yet to receive anything. After the Victory/H2EG merger, I became more relentless in trying to secure this information as well as how many shares each Navitus owner would receive for the merger and when we could expect to be paid out our accrued interest. Brigitte reached out to Grenley and Cosby several times and received nothing but the runaround.

After speaking with several of the other larger investors in VPEG, I found most had the same opinion/consensus that I had. I then decided to reach out to Jim Hart of the Oliver Family to see what he thought based on them being the largest shareholder in VPEG. Jim had some of the same opinions, yet he said he thought the portfolio companies were strong. I asked if he had other information regarding that or was, he solely relying on what he had been told by Ron Zamber, he confirmed it was based on what he had been told by Ron. I then shared some of my experiences and the whole Navitus situation to let him know that he could not rely on anything Ron told him. Over a short period of time, he started to dig deeper and found the discrepancies and inconsistencies in communication to be unacceptable as well.

This is when I decided that I was out, I contacted Mike Cosby and demanded my principal investment and accrued interest to be returned and that if VPEG did not accommodate I was going to engage with Matt Kitzi to legally seek redemption at a higher amount plus my legal fees to do so. I knew Matt had represented some previous investors who sought and received redemptions in 2023.

In typical VPEG fashion my demand was ignored, and I did in fact engage Matt Kitzi to seek redemption and Cosby agreed to a higher amount than I proposed initially. I had been negotiating the redemption demand right up to the point that this lawsuit was filed.

After Matt Kitzi sent the initial demand letter to VPEG/Mike Cosby and I read the information included, I then told Jim that I was seeking a redemption demand and had engaged Matt Kitzi as he had represented some prior LP's in achieving redemption demands. I suggested to Jim that his attorney may want to have a discussion with Matt for his own protection.

I have \$370,387 in VPEG through an IRA, \$55,396 jointly with my wife in cash in VPEG, and \$150,000 in Navitus through an IRA

6. Based on my own experience, and the information contained in the Complaint filed by Plaintiffs in this matter, I support the removal of Dr. Ronald Zamber, Robert Grenley, and Michael Cosby, from their respective positions at Visionary Private Equity Group.

7. I declare under penalty of perjury that the foregoing is true and correct.

Executed on: February 2, 2025



IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MISSOURI

Oliver and Company, et al.,

Plaintiffs,

vs.

Dr. Ronald Zamber, Michael Cosby, Robert
Grenley, Visionary PE GP I, LLC, Visionary
Private Equity Group I, LP, and Visionary
Fund Manager, LLC,

Defendants.

CIVIL ACTION NO.

**DECLARATION OF STEVEN J. GOWER IN SUPPORT OF
PLAINTIFFS' MOTION FOR INJUNCTIVE RELIEF**

I, Steven J. Gower, declare as follow:

1. My name is Steven J. Gower.
2. I am over the age of 18 and have personal knowledge of the facts described herein. If called as a witness, I could and would testify competently and truthfully to these matters.
3. I am an investor with Visionary Private Equity Group.
4. I began investing with Visionary Private Equity Group in 2021, and the total of my investments with Visionary Private Equity Group and its affiliates is \$40,000.
5. I am dissatisfied with the management of Visionary Private Equity Group, based on my own experience I was told and advised that liquidity opportunities were going to be presented, but never were and at the time of investing, and further I was told that the fund had a sunset date of 2024 as an absolute exit plan. I was also told the share price would increase from \$1.00 per share, which ha never happened. Recently there has been information that suggests the shares are being

sold at a discounted rate. I have no faith in the communication, management, or leadership of Dr. Ronald Zamber.

6. Based on my own experience, and the information contained in the Complaint filed by Plaintiffs in this matter, I support the removal of Dr. Ronald Zamber, Robert Grenley, and Michael Cosby, from their respective positions at Visionary Private Equity Group.

7. I declare under penalty of perjury that the foregoing is true and correct.

Executed on: February 6, 2025



**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MISSOURI**

Oliver and Company, et al.,

Plaintiffs,

vs.

Dr. Ronald Zamber, Michael Cosby, Robert
Grenley, Visionary PE GP I, LLC, Visionary
Private Equity Group I, LP, and Visionary
Fund Manager, LLC,

Defendants.

CIVIL ACTION NO.

**DECLARATION OF DONALD SCOTT GRAHAM IN SUPPORT OF
PLAINTIFFS' MOTION FOR INJUNCTIVE RELIEF**

I, Donald Scott Graham, declare as follow:

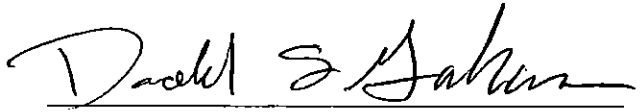
1. My name is Donald Scott Graham.
2. I am over the age of 18 and have personal knowledge of the facts described herein. If called as a witness, I could and would testify competently and truthfully to these matters.
3. I am an investor with Visionary Private Equity Group.
4. I began investing with Visionary Private Equity Group in December 2017, and the total of my investments with Visionary Private Equity Group and its affiliates is \$71,116.00.
5. I am dissatisfied with the management of Visionary Private Equity Group, based on my own experience, including the lack of timely and accurate information regarding the timeline for payout of accrued interest and moving to Fund 2. I, along with other Visionary Private Equity Group limited partners, had in-person meetings in February 2022 and March 2023 with various Visionary Private Equity Group representatives or officers, and when asked for updates, those

people could not and never did provide firm dates for the interest payout or the advancement to Fund 2.

6. Based on my own experience, and the information contained in the Complaint filed by Plaintiffs in this matter, I support the removal of Dr. Ronald Zamber, Robert Grenley, and Michael Cosby, from their respective positions at Visionary Private Equity Group.

7. I declare under penalty of perjury that the foregoing is true and correct.

Executed on: February 3, 2025

A handwritten signature in black ink, appearing to read "David S. Gahm", is written over a horizontal line.

Oliver and Company, et al.,

Plaintiffs,

vs.

Dr. Ronald Zamber, Michael Cosby, Robert
Grenley, Visionary PE GP I, LLC, Visionary
Private Equity Group I, LP, and Visionary
Fund Manager, LLC,

Defendants.

CIVIL ACTION NO.

**DECLARATION OF ROY L GROSECLOSE IN SUPPORT OF
PLAINTIFFS' MOTION FOR INJUNCTIVE RELIEF**

I, Roy L. Groseclose, declare as follow:

1. My name is Roy L. Groseclose.
2. I am over the age of 18 and have personal knowledge of the facts described herein. If called as a witness, I could and would testify competently and truthfully to these matters.
3. I am an investor with Visionary Private Equity Group.
4. I began investing with Visionary Private Equity Group on March 17, 2014, and the total of my investments with Visionary Private Equity Group and its affiliates is \$77057.00.
5. I am dissatisfied with the management of Visionary Private Equity Group, based on my own experience of receiving my yearly required RMD. My VPEG money is held in a traditional IRA account with Inspira. Without cashing in shares, the money for the RMD distribution is obtained from a transfer of cash from the VPEG to Inspira. This cash is accrued interest with the VPEG. Inspira cannot issue my RMD until this cash is received from the VPEG. I started trying

Case: 4:25-cv-00132-MTS Doc. #: 33-4 Filed: 03/07/25 Page: 39 of 86 PageID #: 553

to get this transfer completed for my 2024 RMD in November of 2024. There has been no transfer of cash or RMD issued to date with no explanation of why. I am now faced with stiff penalties and interest charges for being late.

6. Based on my own experience, and the information contained in the Complaint filed by Plaintiffs in this matter, I support the removal of Dr. Ronald Zamber, Robert Grenley, and Michael Cosby, from their respective positions at Visionary Private Equity Group.

7. I declare under penalty of perjury that the foregoing is true and correct.

Executed on: February 6, 2025

Ray E. Brown

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MISSOURI**

Oliver and Company, et al.,

Plaintiffs,

vs.

Dr. Ronald Zamber, Michael Cosby, Robert
Grenley, Visionary PE GP I, LLC, Visionary
Private Equity Group I, LP, and Visionary
Fund Manager, LLC,

Defendants.

CIVIL ACTION NO.

**DECLARATION OF JULIA HAGEN IN SUPPORT OF
PLAINTIFFS' MOTION FOR INJUNCTIVE RELIEF**

I, Julia Hagen, declare as follow:

1. My name is Julia Hagen.
2. I am over the age of 18 and have personal knowledge of the facts described herein. If called as a witness, I could and would testify competently and truthfully to these matters.
3. I am an investor with Visionary Private Equity Group.
4. I began investing with Visionary Private Equity Group in December, 2022, and the total of my investments with Visionary Private Equity Group and its affiliates is \$360,624.66.
5. I am dissatisfied with the management of Visionary Private Equity Group. My husband, Adam Dufficy, has been the primary point of contact with VPEG and the Defendants relating to my investment. He has detailed in his declaration the issues with Defendants that have resulted in my concerns and this declaration.

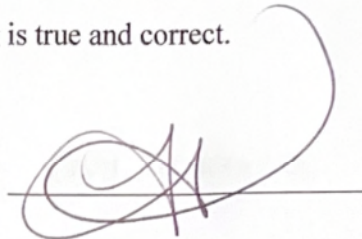
6. Based on my own experience, and the information contained in the Complaint filed by Plaintiffs in this matter, I support the removal of Dr. Ronald Zamber, Robert Grenley, and Michael Cosby, from their respective positions at Visionary Private Equity Group.

7. I declare under penalty of perjury that the foregoing is true and correct.

Executed on: February 2nd, 2025

Dr. Ronald Zamber, Robert Grenley, Michael Cosby, Robert Grenley, Visionary PE GP U.L.L.C., Visionary Private Equity Group U.L.P., and Visionary Fund Manager, L.L.C.

Defendants.



Declaration of Marilee Abbott in Support of
Plaintiffs' Motion for Inherent Jurisdiction

I, Marilee Abbott, declare as follows:

1. My name is Marilee Abbott.
2. I am over the age of 18 and have personal knowledge of the facts described herein, if called as a witness. I could and would testify competently and truthfully to those facts.
3. I am an investor with Visionary Private Equity Group.
4. I began investing with Visionary Private Equity Group in December, 2022, and the cost of my investments with Visionary Private Equity Group and its affiliates is \$49,109.00.
5. I am dissatisfied with the management of Visionary Private Equity Group. My son, Adam Duffley, has been the primary point of contact with VPBG and the Defendants relating to my investment. He has detailed in his declaration the issues with Defendants that have resulted in my concerns and this declaration.

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MISSOURI**

Oliver and Company, et al.,

Plaintiffs,

vs.

Dr. Ronald Zamber, Michael Cosby, Robert
Grenley, Visionary PE GP I, LLC, Visionary
Private Equity Group I, LP, and Visionary
Fund Manager, LLC,

Defendants.

CIVIL ACTION NO.

**DECLARATION OF MATT HAYDEN IN SUPPORT OF
PLAINTIFFS' MOTION FOR INJUNCTIVE RELIEF**

I, Matt Hayden, declare as follow:

1. My name is Matt Hayden. I am the trustee of Sea Purity Hayden Trust.
2. I am over the age of 18 and have personal knowledge of the facts described herein. If called as a witness, I could and would testify competently and truthfully to these matters.
3. I am an investor with Visionary Private Equity Group.
4. I began investing with Visionary Private Equity Group in January 2021 through Sea Purity Hayden Trust, where I am the trustee, and the total of my investments with Visionary Private Equity Group and its affiliates is \$250,000.
5. I am dissatisfied with the management of Visionary Private Equity Group, based on my own experience including the following. I have repeatedly noted VPEG's lack of financial reporting and transparency to Dr. Zamber and Mr. Grenley, and even introduced an auditor (Eide Bailly) to address the lack of detail or transparency in VPEG's financial reporting. They ignored

this and VPEG has continued its failure to provide detailed or transparent financial reporting. Without proper, 3rd party validated reporting, it is impossible to understand true current value for the portfolio relative to the investments made to date.

6. VPEG (through Dr. Zamber and Mr. Grenley) represented to me that the fund was closing to new investors shortly after my investment, which I relied on in my decision to invest. Despite this representation, I learned that VPEG continued to solicit new investment funds in 2023-2024 and even through today. I raised this issue with Dr. Zamber and Mr. Grenley, and again, nothing was done. The ability to manage numerous investments, assist portfolio companies in strategy and exits requires professionals with experience in completing these tasks. Through my conversations with the Visionary Private Equity Group management team and support by their track record, or lack thereof, I do not believe it is possible for the current management team of Visionary Private Equity Group to effectuate an optimal outcome for its LP investors. I have requested for months to have a call with Ron Zamber through Rob Grenley which have never materialized.

7. Based on my own experience, and the information contained in the Complaint (and any amendments thereto) filed by Plaintiffs in this matter, I support the removal of Dr. Ronald Zamber, Robert Grenley, and Michael Cosby, from their respective positions at Visionary Private Equity Group.

8. I declare under penalty of perjury that the foregoing is true and correct.

Executed on: February 13, 2025



Matt Hayden, Trustee

Sea Purity Hayden Trust

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MISSOURI**

Oliver and Company, et al.,

Plaintiffs,

vs.

Dr. Ronald Zamber, Michael Cosby, Robert
Grenley, Visionary PE GP I, LLC, Visionary
Private Equity Group I, LP, and Visionary
Fund Manager, LLC,

Defendants.

CIVIL ACTION NO.

**DECLARATION OF MICHELLE JORDAN IN SUPPORT OF
PLAINTIFFS' MOTION FOR INJUNCTIVE RELIEF**

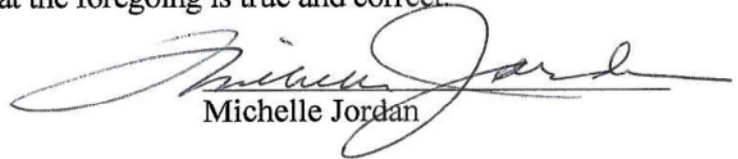
I, Michelle Jordan, declare as follow:

1. My name is Michelle Jordan.
2. I am over the age of 18 and have personal knowledge of the facts described herein. If called as a witness, I could and would testify competently and truthfully to these matters.
3. I am an investor with Visionary Private Equity Group.
4. I began investing with Visionary Private Equity Group in 2017, and the total of my investments with Visionary Private Equity Group and its affiliates is \$ \$20,000.
5. I am dissatisfied with the management of Visionary Private Equity Group, based on my own experience. The management teams lack of communication and ability to reach any stated goals or deadlines. Any updates we have received are false and fall well short of what we were told. Simple task, such as completing the yearly RMD for investors seems to be a monumental project for the management team.

6. Based on my own experience, and the information contained in the Complaint filed by Plaintiffs in this matter, I support the removal of Dr. Ronald Zamber, Robert Grenley, and Michael Cosby, from their respective positions at Visionary Private Equity Group.

7. I declare under penalty of perjury that the foregoing is true and correct.

Executed on: February 4, 2025


Michelle Jordan

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MISSOURI**

Oliver and Company, et al.,

Plaintiffs,

vs.

Dr. Ronald Zamber, Michael Cosby, Robert
Grenley, Visionary PE GP I, LLC, Visionary
Private Equity Group I, LP, and Visionary
Fund Manager, LLC,

Defendants.

CIVIL ACTION NO.

**DECLARATION OF RYAN C. KENNEDY IN SUPPORT OF
PLAINTIFFS' MOTION FOR INJUNCTIVE RELIEF**

I, Ryan C. Kennedy, declare as follow:

1. My name is Ryan C. Kennedy.
2. I am over the age of 18 and have personal knowledge of the facts described herein. If called as a witness, I could and would testify competently and truthfully to these matters.
3. I am an investor with Visionary Private Equity Group.
4. I began investing with Visionary Private Equity Group in January 2021, and the total of my investments with Visionary Private Equity Group and its affiliates is \$20,000.
5. I am dissatisfied with the management of Visionary Private Equity Group, based on my own experience. When I first sat down with them, or at least their rep, I was told that the shares would be worth \$75-\$100 per share, that we were jumping in towards the tail end, and we would benefit from this within a year or so. I was also told they were offered at \$38 a share one time over the phone with the rep, and asked why we wouldn't accept, and was told they believe they can get

more. Then when I brought that up in a meeting, the rep said he never said that. It's been four years and I have yet to see any sort of return on my investment. While being told many times that big things are coming, that has not been the case. I was also told when I invested that I was the last one to get in. Within a month I found out that others invested after me and they were told that their shares would be worth \$50-\$75 per share, that was a major red flag to me, but I knew I had my money invested already and I could not get it back. So, I have been paying attention and contacting the rep asking for updates and being told everything's looking good and telling me about Coinbase, and all this other stuff to excite us, but nothing has happened. Last year I emailed the rep explaining my disappointment and what is going on and how little I have in the decision makers and their plans to move forward. I believe there's been lies spread and false information given to all the investors so that the main people can benefit profits off what is going on and keeping us out of the loop I never did receive an email back from the rep which was another red flag. I am disgusted with the manipulation from visionary private equity group, to acquire money from investors for their own personal gain. That is how I feel about this whole situation.

6. Based on my own experience, and the information contained in the Complaint filed by Plaintiffs in this matter, I support the removal of Dr. Ronald Zamber, Robert Grenley, and Michael Cosby, from their respective positions at Visionary Private Equity Group.

7. I declare under penalty of perjury that the foregoing is true and correct.

Executed on: February 7, 2025

s/ Ryan C. Kennedy

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MISSOURI**

Oliver and Company, et al.,

Plaintiffs,

vs.

Dr. Ronald Zamber, Michael Cosby, Robert
Grenley, Visionary PE GP I, LLC, Visionary
Private Equity Group I, LP, and Visionary
Fund Manager, LLC,

Defendants.

CIVIL ACTION NO.

**DECLARATION OF AMIR KHALIL IN SUPPORT OF
PLAINTIFFS' MOTION FOR INJUNCTIVE RELIEF**

I, Amir Khalil, declare as follow:

1. My name is Amir Khalil.
2. I am over the age of 18 and have personal knowledge of the facts described herein. If called as a witness, I could and would testify competently and truthfully to these matters.
3. I am an investor with Visionary Private Equity Group.
4. I began investing with Visionary Private Equity Group in December of 2020, and the total of my investments with Visionary Private Equity Group and its affiliates is \$868,826.94. \$505,391 (\$166,295.69 Memorandum/interest owed) in cash, \$153,583(Additional \$43,557.28 memorandum/interest owed) in IRA.
5. I am dissatisfied with the management of Visionary Private Equity Group, based on my own experience with Ron Zamber, Rob Grenley and Mike Crosby. Their practice of ignoring clients is almost a required business acumen for employment with their firm. I

have made dozens of requests for calls with Rob Grenley though my over 4 years of dealing with the VPEG and it always comes with delays. Scheduling conflicts and last minute changes. Our last call request with Mike Crosby had to get rescheduled and took a long time for even a response of options from Mike. Once we got options, he last minute changed the call and postponed it. Once on the call, we attempted to discuss numbers with the general partner and CPA for the accounting of this company and he had no information to provide and decided to drop off the call less than 10 minutes in without a reason.

6. We were told by Rob G. that if we wanted to leave the fund due to our dissatisfaction with the way it was managed, they (VPEG) would work on getting other investors to purchase our shares and memo balance. Meaning we would lose all the interest earned so far. This was a terrible tactic as we know that the VPEG has previously redeemed others at a much higher rate. Additionally we were promised that wouldn't take long but we are aware of other investors that were willing to do this that were passed up. Meaning new money came in, over 6 million according to Rob G. and they weren't helped to get out.
7. I pursued a redemption and was ghosted for the duration of my timeline provided by my lawyer, they then responded with less than a few hours left to the deadline and Mike Crosby asked for more time as he was traveling internationally which seems to be a common excuse by almost all that are dealing with him. He then missed the deadline he promised he would keep and then provided a redemption agreement late that was going to be paid back over 12 quarterly payments stretching this into 2028. With my knowledge and interactions with other investors, this has proven to be a stall tactic as others have been ghosted as they negotiate the redemption.

8. I along with others on my calls with Rob Grenley requested calls with Ron Zamber directly as he holds a significant amount of my money and was promised a call on numerous occasions. I was never provided the opportunity to speak with Ron Zamber directly.
9. I was lied to about an arbitrage deal that was going to purchase a large percentage of the VPEG fund at \$1.50 and I was told that is a quick 50% profit on funds. It was a tactic to get me to purchase additional shares prior to the deal getting made. This deal never happened and I'm not even sure if it ever had real legs. Nevertheless, the VPEG consistently practiced a deceitful practice of making promises that weren't coming true
10. I was lied to about liquidation events and timelines on almost every occasion as there has only been 1 liquidation event that I have benefited \$2380.00 on my cash side and \$503.00 on IRA investment. Both were reinvested in the VPEG and was early on in my involvement with the VPEG. This early liquidation was a confidence builder but another never happened and the VPEG and their management team consistently lied about the timeline of the next liquidation. The timeline of the facebook/meta lawsuit money etc.
11. I was lied to when I initially invested in the VPEG fund. I was told the fund is closing and they (VPEG) will be working on fund 2 and I had a limited time to get in. I was told the fund was closing in weeks to end the year or early in the new year in Q1. The mystery of when the fund would close was an initial carrot that was dangled in front of me that I have reflected on as a early red flag that I didn't follow.
12. There has been a consistent lie of the fund closing and the price changing for fund 2 since I've been in the fund in 2020. Even with the most recent situation where I found out that the fund was giving away "bonus" shares. Meaning for every 2 dollars you spend, you get 1 share for free. This dilutes the existing pool of investors and is a typical practice in my

option of a company that is more desperate for funds. The bigger issue of this, existing investors like myself and the majority of my contacts weren't offered this bonus opportunity. Nor was it provided retroactively to the existing shares.

13. My interaction with Rob on the call about the bonus shares was a tense one as he didn't know how to navigate the fact that the bonus shares have been offered to others for over a year. On this call I requested to speak to Ron Zamber again and Rob promised he would arrange it.

14. I asked Rob for explanations on the spending on the Visionary media group and he couldn't explain and as the director, he should be able to explain. He spent weeks gathering information that simply didn't match what was discussed or provided previously and again another lie and misrepresentation of what's going on by the VPEG. The media group is the largest investment by the VPEG at between 13-15 million and the over 6 million that was raised in 2024 more was put in but not accounted for by Rob in any discussions. He then provided me an email with the value within the media group of insounds and other things totaling under 3 million.

15. In my conversations with Media group employees, there are countless situations where Ron Zamber used funds in a manner that he was advised not to and he continued to have a burn rate that outpaced the raising of funds. He was getting new money to pay old debts or continue a media mogul lifestyle. The media group is out of funds and its because of the burn rate that is placed

16. Ron Zamber has "advisors" that he pays anywhere from \$10,000 to \$20,000 for no significant work and it appears to me as if that use of funds is purely to enrich a few of his friends and or pay off old disgruntled employees. All while his current employees that are

currently doing investor relations are behind on their pay. Some are behind over \$50,000 and I'm sure there are others that are even more behind. I've heard rumors that some are behind over \$100,000 but I'm sure we will find out in this suit. Having hundreds of thousands of dollars in back pay and choosing not to pay your 1099 employees their owed money is a demonstration of fiscal mismanagement and an ethics question.

17. The predatory manipulation of information and creating a fear of missing out on the next chance to become financially free has been a tactic of the VPEG for as long as I've been a part of it. "Creating generational wealth" is what I was told and pushed to continue to invest.
18. There have been liquidation events of smaller companies and the investors saw none of the proceeds from those sales. And the 8% return that was promised has not been seen. Additional liquidation events have all been blamed on covid and how that changed the market.
19. There has been very poor tracking of funds and spending as money just disappears as soon as it comes in. Their covid clinic was a big play during covid, and my wife purchased covid tests for her business and 2 weeks after payment, no tests were provided. She lowered her order and still no tests were provided. We then got a refund and only purchased a small amount of tests instead of the 18k in tests initially. Again, promises but no deliverables. But I got my money back there. But this clinic served as one of 3 clinics in St. Louis and provided tens of thousands and maybe even over a hundred thousand people were vaccinated at these clinics and over 1.5 million invested and no return provided while the clinic is now no longer functioning. And again money that has disappeared.

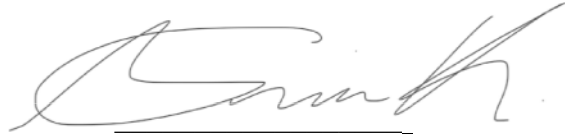
20. It is my belief and opinion that the predatory tactics used by Ron Z. and Rob G. by chasing new investor dollars to maintain the image and spend is taking advantage of investors. Many of which have all their retirement in the fund and are at an age where they need those funds.

21. It is my opinion that with the limited amount of information I have with the investors I have spoken with and with the situations I have been in that there is a lot more going on with the VPEG and the red flags are all over.

22. Based on my own experience, and the information contained in the Complaint filed by Plaintiffs in this matter, I support the removal of Dr. Ronald Zamber, Robert Grenley, and Michael Cosby, from their respective positions at Visionary Private Equity Group.

23. I declare under penalty of perjury that the foregoing is true and correct.

Executed on: February 3, 2025

A handwritten signature in black ink, appearing to read "Brian H.", is written over a horizontal line.

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MISSOURI

Oliver and Company, et al.,

Plaintiffs,

vs.

Dr. Ronald Zamber, Michael Cosby, Robert
Grenley, Visionary PE GP I, LLC, Visionary
Private Equity Group I, LP, and Visionary
Fund Manager, LLC,

Defendants.

CIVIL ACTION NO.

**DECLARATION OF KEVIN KUHN IN SUPPORT OF
PLAINTIFFS' MOTION FOR INJUNCTIVE RELIEF**

I, Kevin Kuhn, declare as follows:

1. My name is Kevin Kuhn.
2. I am over the age of 18 and have personal knowledge of the facts described herein. If called as a witness, I could and would testify competently and truthfully to these matters.
3. I am an investor with Visionary Private Equity Group.
4. I began investing with Visionary Private Equity Group in March 2021, and the total of my investments with Visionary Private Equity Group and its affiliates is \$15,000.
5. I am dissatisfied with the management of Visionary Private Equity Group, based on my own experience because the timelines associated with payouts have not been realized and I no longer have any confidence in the leadership decisions being made with the interests of the investors in mind. Based on the information I've been given, I believe the current managers of the

VPEG fund should be removed from a position of making any decisions regarding the fund and replaced with individuals that have the investors best interests in mind.

6. Based on my own experience, and the information contained in the Complaint filed by Plaintiffs in this matter, I support the removal of Dr. Ronald Zamber, Robert Grenley, and Michael Cosby, from their respective positions at Visionary Private Equity Group.

7. I declare under penalty of perjury that the foregoing is true and correct.

Executed on: February 6, 2025



**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MISSOURI**

Oliver and Company, et al.,

Plaintiffs,

vs.

Dr. Ronald Zamber, Michael Cosby, Robert
Grenley, Visionary PE GP I, LLC, Visionary
Private Equity Group I, LP, and Visionary
Fund Manager, LLC,

Defendants.

CIVIL ACTION NO.

**DECLARATION OF ROBERT LAWTON IN SUPPORT OF
PLAINTIFFS' MOTION FOR INJUNCTIVE RELIEF**

I, Robert Lawton, declare as follow:

1. My name is Robert Lawton.
2. I am over the age of 18 and have personal knowledge of the facts described herein. If called as a witness, I could and would testify competently and truthfully to these matters.
3. I am an investor with Visionary Private Equity Group.
4. I began investing with Visionary Private Equity Group in February 2021, and the total of my investments with Visionary Private Equity Group and its affiliates is \$110,000.
5. I am dissatisfied with the management of Visionary Private Equity Group, based on my own experience.
6. Based on my own experience, and the information contained in the Complaint filed by Plaintiffs in this matter, I support the removal of Dr. Ronald Zamber, Robert Grenley, and Michael Cosby, from their respective positions at Visionary Private Equity Group.
7. I declare under penalty of perjury that the foregoing is true and correct.

Executed on: February 7, 2025

s/ Robert Lawton

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MISSOURI**

Oliver and Company, et al.,

Plaintiffs,

vs.

Dr. Ronald Zamber, Michael Cosby, Robert
Grenley, Visionary PE GP I, LLC, Visionary
Private Equity Group I, LP, and Visionary
Fund Manager, LLC,

Defendants.

CIVIL ACTION NO.

**DECLARATION OF SHIRLEY J. LEWIS IN SUPPORT OF
PLAINTIFFS' MOTION FOR INJUNCTIVE RELIEF**

I, Shirley J. Lewis, declare as follow:

1. My name is Shirley J. Lewis.
2. I am over the age of 18 and have personal knowledge of the facts described herein. If called as a witness, I could and would testify competently and truthfully to these matters.
3. I am an investor with Visionary Private Equity Group.
4. I began investing with Visionary Private Equity Group in 2016, and the total of my investments with Visionary Private Equity Group and its affiliates is \$197,728.00.
5. I am dissatisfied with the management of Visionary Private Equity Group, based on my own experience with what has been communicated to me personally by VPEG officers and management as well as my son in law and Financial POA, Steven J. Giacin. I am in agreement with all comments Steven provided in his declaration below:

"Through my nine years as an investor in VPEG, the communication has always been slow. As a group that has many non-accredited investors, my initial thought was that VPEG

was just being careful in what they communicated because a lot of their investors could not handle the volatility in information.

As time went on, the communication started to be very erratic, and it seemed like VPEG was constantly moving from one hot opportunity to the next big thing and portraying to the investors that a payday was eminent by doing this. There have been no less than 5 or 6 times since 2016 that we were informed that others would be investing or adding money because the \$1.00 per share opportunity was closing down. This never happened and as of recently VPEG was allowing new investors to come in at the same \$1.00 per share yet gifting them bonus shares for doing so. This shows a pattern of mismanagement in always needing to raise funds at any cost by diluting the shares for all investors. Also important to note here, VPEG has not hit any self-proclaimed dates or timelines that they stated would happen during my time as an investor.

Before 2021, Brigitte had or could get reasonable answers and had oversight internally to bank accounts, money that came in, admin and staff expenses, etc. She could tell me how much money was in the escrow account that could not be touched as it was accumulating to be disbursed to the shareholders. Since 2021, Brigitte was removed from all the accounts and forced to receive information to communicate to investors through Mike Cosby and Rob Grenley instead of directly from Ron Zamber.

This is where I started noticing the serious inconsistency in information provided. Ron Zamber stopped paying Brigitte and her Investor Relations group and basically told them all he was done with them. Anyone who would do that lacks the integrity needed for me to trust them with my investment. I started asking a lot of questions, had several calls with Grenley and other investors where I caught him lying consistently based on information I already had or knew to be factual. In shareholder meetings that I set up for a group of investors with VPEG officers and management staff in February of 2022 and May of 2023, many questions were collectively asked of when they anticipated moving to Fund 2, when we would be receiving the balance of accrued interest and what was the delay in disbursing funds that had been public knowledge that closed already. We never received answers to these questions.

As a Navitus investor as well, I have been asking for statements showing my principal and accrued interest for over 3 years, I have yet to receive anything. After the Victory/H2EG merger, I became more relentless in trying to secure this information as well as how many shares each Navitus owner would receive for the merger and when we could expect to be paid out our accrued interest. Brigitte reached out to Grenley and Cosby several times and received nothing but the runaround.

After speaking with several of the other larger investors in VPEG, I found most had the same opinion/consensus that I had. I then decided to reach out to Jim Hart of the Oliver Family to see what he thought based on them being the largest shareholder in VPEG. Jim had some of the same opinions, yet he said he thought the portfolio companies were strong. I asked if he had other information regarding that or was, he solely relying on what he had been told by Ron Zamber, he confirmed it was based on what he had been told by Ron. I then shared some of my experiences and the whole Navitus situation to let him know that he could not rely on anything

Ron told him. Over a short period of time, he started to dig deeper and found the discrepancies and inconsistencies in communication to be unacceptable as well.

This is when I decided that I was out, I contacted Mike Cosby and demanded my principal investment and accrued interest to be returned and that if VPEG did not accommodate I was going to engage with Matt Kitzi to legally seek redemption at a higher amount plus my legal fees to do so. I knew Matt had represented some previous investors who sought and received redemptions in 2023.

In typical VPEG fashion my demand was ignored, and I did in fact engage Matt Kitzi to seek redemption and Cosby agreed to a higher amount than I proposed initially. I had been negotiating the redemption demand right up to the point that this lawsuit was filed.

After Matt Kitzi sent the initial demand letter to VPEG/Mike Cosby and I read the information included, I then told Jim that I was seeking a redemption demand and had engaged Matt Kitzi as he had represented some prior LP's in achieving redemption demands. I suggested to Jim that his attorney may want to have a discussion with Matt for his own protection."

I have \$147,728 invested in VPEG, and \$50,000 invested in Navitus.

6. Based on my own experience, and the information contained in the Complaint filed by Plaintiffs in this matter, I support the removal of Dr. Ronald Zamber, Robert Grenley, and Michael Cosby, from their respective positions at Visionary Private Equity Group.

7. I declare under penalty of perjury that the foregoing is true and correct.

Executed on: February 2, 2025

SHIRLEY LEWIS

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MISSOURI**

Oliver and Company, et al.,

Plaintiffs,

vs.

Dr. Ronald Zamber, Michael Cosby, Robert
Grenley, Visionary PE GP I, LLC, Visionary
Private Equity Group I, LP, and Visionary
Fund Manager, LLC,

Defendants.

CIVIL ACTION NO.

**DECLARATION OF IN SUPPORT OF
PLAINTIFFS' MOTION FOR INJUNCTIVE RELIEF**

I, Jacquelyn Marushka, declare as follow:

1. My name is Jacquelyn Marushka.
2. I am over the age of 18 and have personal knowledge of the facts described herein. If called as a witness, I could and would testify competently and truthfully to these matters.
3. I am an investor with Visionary Private Equity Group.
4. I began investing with Visionary Private Equity Group in 2022, and the total of my investments with Visionary Private Equity Group and its affiliates is \$15,000.
5. At the time of my investment, I was hired as a publicist for VPEG and Visionary Media Group. Dr. Zamber and Mr. Grenley stated that it was necessary for me to have skin in the game as part of being hired. When I have requested information about my investment from Dr. Zamber or Mr. Grenley over the past two years, they have deflected or not answered my questions.

6. I also am owed \$25,000 for various services that I have performed and expenses in 2024. Copies of these unpaid invoices are attached to my declaration.

7. I have repeatedly asked Dr. Zamber for my overdue payment, and he has failed to pay me, and instead, generally blamed unspecified cash flow issues or an unidentified Board (that he has asked me not to contact).

8. On January 31, 2025, I elected to terminate my publicist position due to this non-payment and Dr. Zamber's related evasions and other concerns, and I'm not aware of any other publicist providing services. My resignation email is attached to my declaration.

9. One concern is the lack of budget at Visionary Media Group. I raised this concern on multiple occasions with Dr. Zamber and requested monthly budget meetings. Dr. Zamber responded that he was responsible for any budget, and refused to share this detail with me.

10. I also raised concerns about numerous people that were being paid by Visionary Media Group but were providing no services in exchange for this payment.

11. I am dissatisfied with the management of Visionary Private Equity Group, based on my own experience

12. Based on my own experience, and the information contained in the Complaint filed by Plaintiffs in this matter, I support the removal of Dr. Ronald Zamber, Robert Grenley, and Michael Cosby, from their respective positions at Visionary Private Equity Group.

13. I declare under penalty of perjury that the foregoing is true and correct.

Executed on: 2/2/2025

A handwritten signature in black ink, appearing to read "Ajay S. Manish", is written over a horizontal line.

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MISSOURI**

Oliver and Company, et al.,

Plaintiffs,

vs.

Dr. Ronald Zamber, Michael Cosby, Robert
Grenley, Visionary PE GP I, LLC, Visionary
Private Equity Group I, LP, and Visionary
Fund Manager, LLC,

Defendants.

CIVIL ACTION NO.

**DECLARATION OF TERRI MATHEIS IN SUPPORT OF
PLAINTIFFS' MOTION FOR INJUNCTIVE RELIEF**

I, Terri Matheis, declare as follow:

1. My name is Terri Matheis.
2. I am over the age of 18 and have personal knowledge of the facts described herein. If called as a witness, I could and would testify competently and truthfully to these matters.
3. I am an investor with Visionary Private Equity Group.
4. I began investing with Visionary Private Equity Group in January 2021, and the total of my investments with Visionary Private Equity Group and its affiliates is \$30,000.
5. I am dissatisfied with the management of Visionary Private Equity Group, based on my own experience. Initially, I was informed that all funds needed to be received by January 14, 2021, at which time Phase One would be closed to other investors. However, as of today, February 5, 2025, Phase One remains open, and investors are still being solicited. This inconsistency raises serious doubts about the integrity of the management's claims.

Over the course of these four years, numerous purchases and sales have been made, including a notable investment in Coinbase. Despite expectations, I have never seen a return from this investment. The management provided a rationale claiming that the funds were part of another company, but this was not how the opportunity was originally presented, which leads me to question the transparency of the management.

In December 2024, I expressed my concerns about the possibility of this being a scam, suggesting that it appears to primarily benefit the owners through their salaries while leaving investors like myself without any payout. When I demanded a meeting with the local owners in 2023, I was only provided an audience with other investors who believed their investments were secure, contrary to my skepticism. The ongoing solicitation of investments and the repetitive extensions of Phase One only serve to amplify my distrust.

6. Based on my own experience, and the information contained in the Complaint filed by Plaintiffs in this matter, I support the removal of Dr. Ronald Zamber, Robert Grenley, and Michael Cosby, from their respective positions at Visionary Private Equity Group.

7. I declare under penalty of perjury that the foregoing is true and correct.

Executed on: February 6, 2025

/s Terri Matheis

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MISSOURI**

Oliver and Company, et al.,

Plaintiffs,

vs.

Dr. Ronald Zamber, Michael Cosby, Robert
Grenley, Visionary PE GP I, LLC, Visionary
Private Equity Group I, LP, and Visionary
Fund Manager, LLC,

Defendants.

CIVIL ACTION NO.

**DECLARATION OF JASON NISSING IN SUPPORT OF
PLAINTIFFS' MOTION FOR INJUNCTIVE RELIEF**

I, Jason Nissing, declare as follow:

1. My name is Jason Nissing.
2. I am over the age of 18 and have personal knowledge of the facts described herein. If called as a witness, I could and would testify competently and truthfully to these matters.
3. I am an investor with Visionary Private Equity Group.
4. I began investing with Visionary Private Equity Group in 2020, and the total of my investments with Visionary Private Equity Group and its affiliates is \$112,504.
5. I am dissatisfied with the management of Visionary Private Equity Group, based on my own experience.
6. Based on my own experience, and the information contained in the Complaint filed by Plaintiffs in this matter, I support the removal of Dr. Ronald Zamber, Robert Grenley, and Michael Cosby, from their respective positions at Visionary Private Equity Group.

7. I declare under penalty of perjury that the foregoing is true and correct.

Executed on: February 7, 2025

s/ Jason Nissing

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MISSOURI**

Oliver and Company, et al.,

Plaintiffs,

vs.

CIVIL ACTION NO. 4:25-cv-00132

Dr. Ronald Zamber, Michael Cosby, Robert
Grenley, Visionary PE GP I, LLC, Visionary
Private Equity Group I, LP, and Visionary Fund
Manager, LLC,

Defendants.

**DECLARATION OF DENNIE O'DOWD IN SUPPORT OF
PLAINTIFFS' MOTION FOR INJUNCTIVE RELIEF**

I, Dennis M. O'Dowd, declare as follow:

1. My name is Dennis M. O'Dowd.
2. I am over the age of 18 and have personal knowledge of the facts described herein. If called as a witness, I could and would testify competently and truthfully to these matters.
3. I am an investor with Visionary Private Equity Group. I began investing with Visionary Private Equity Group on August 14, 2020, and the total of my investments with Visionary Private Equity Group and its affiliates is Initial Investment of \$24,096.00.
4. I am dissatisfied with the management of Visionary Private Equity Group, based on my own experience. Information was shared to us that liquidity events were coming. 2024 would do an absolute exit ramp and a visionary fund would be closed and a second one opened concentrating on more media driven approach would be the focus. As I am aware, this was taking place with VPEG 1. Many things were said to be happening. As I am aware none have happened.
5. Based on my own experience, and the information contained in the Complaint filed by Plaintiffs in this matter, I support the removal of Dr. Ronald Zamber, Robert Grenley, and Michael Cosby, from their respective positions at Visionary Private Equity Group.
6. I declare under penalty of perjury that the foregoing is true and correct.

Executed on: February 6, 2025

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IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MISSOURI

Oliver and Company, et al.,

Plaintiffs,

vs.

Dr. Ronald Zamber, Michael Cosby, Robert
Grenley, Visionary PE GP I, LLC, Visionary
Private Equity Group I, LP, and Visionary
Fund Manager, LLC,

Defendants.

CIVIL ACTION NO.

**DECLARATION OF SCOTT RITCHIE IN SUPPORT OF
PLAINTIFFS' MOTION FOR INJUNCTIVE RELIEF**

I, Scott Ritchie, declare as follow:

1. My name is Scott Ritchie.
2. I am over the age of 18 and have personal knowledge of the facts described herein. If called as a witness, I could and would testify competently and truthfully to these matters.
3. I am an investor with Visionary Private Equity Group.
4. I began investing with Visionary Private Equity Group in May of 2018, and the total of my investments with Visionary Private Equity Group and its affiliates is \$100,000.
5. I am dissatisfied with the management of Visionary Private Equity Group. Based on my own experience, the current Leadership has continued to set and not deliver on expectations. In addition, their communications have been inconsistent which has impugned their credibility as VPEG Leaders.

6. Based on my own experience, and the information contained in the Complaint filed by Plaintiffs in this matter, I support the removal of Dr. Ronald Zamber, Robert Grenley, and Michael Cosby, from their respective positions at Visionary Private Equity Group.

7. I declare under penalty of perjury that the foregoing is true and correct.

Executed on: February 2, 2025

A handwritten signature in blue ink, appearing to read "Scott D. Ritchie", with a long horizontal flourish extending to the right.

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MISSOURI**

Oliver and Company, et al.,

Plaintiffs,

vs.

Dr. Ronald Zamber, Michael Cosby, Robert
Grenley, Visionary PE GP I, LLC, Visionary
Private Equity Group I, LP, and Visionary
Fund Manager, LLC,

Defendants.

CIVIL ACTION NO.

**DECLARATION OF CONCRETE INDUSTRIES IN SUPPORT OF
PLAINTIFFS' MOTION FOR INJUNCTIVE RELIEF**

I, Michael E. Shumaker, declare as follow:

1. My name is Mike Shumaker.
2. I am over the age of 18 and have personal knowledge of the facts described herein. If called as a witness, I could and would testify competently and truthfully to these matters.
3. I am an investor with Visionary Private Equity Group.
4. I began investing with Visionary Private Equity Group in May 2017, and the total of my investments with Visionary Private Equity Group and its affiliates is \$490,000.
5. I am dissatisfied with the management of Visionary Private Equity Group. Upon review of my many emails with VPEG representatives, I have consistently questioned the lack of communication, transparency, and timeliness of information. I offer some examples:
 - a. Besides the original VPEG investment, I inquired about my direct investment into Shop4E. Shop4E was folded into another VPEG company for which I know nothing of its status.

b. On multiple occasions, going back to the original investment, I have inquired about untimely quarterly Capital Account Statements. Further, I have never had an answer as to VPEG's obligation to pay compound interest on the preferred allocation which has had a limited pay out thus far.

c. The Media Group went from 15% of the portfolio to 20% based on sector weights from 2018 to 2023. I never envisioned VPEG as an entertainment enterprise but it seemed like other portfolio entities were also being tied to the success, or lack thereof, relating to the media group.

d. The energy sector went from 38% to 24% and several invested assets appeared to be shifted around to other related entities with no explanation.

e. Liquidity events have not been delivered as presented in emails and VPEG executive summaries.

6. Based on my own experience, and the information contained in the Complaint filed by Plaintiffs in this matter, I support the removal of Dr. Ronald Zamber, Robert Grenley, and Michael Cosby, from their respective positions at Visionary Private Equity Group.

7. I declare under penalty of perjury that the foregoing is true and correct.

Executed on: February 5, 2025



Michael E. Shumaker, President

Concrete Industries Inc.

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MISSOURI

Oliver and Company, et al.,

Plaintiffs,

vs.

CIVIL ACTION NO.

Dr. Ronald Zamber, Michael Cosby, Robert
Grenley, Visionary PE GP I, LLC, Visionary
Private Equity Group I, LP, and Visionary Fund
Manager, LLC,

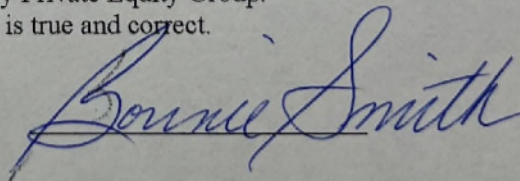
Defendants.

**DECLARATION OF BONNIE SMITH IN SUPPORT OF
PLAINTIFFS' MOTION FOR INJUNCTIVE RELIEF**

I, Bonnie Smith, declare as follow:

1. My name is Bonnie Smith.
2. I am over the age of 18 and have personal knowledge of the facts described herein. If called as a witness, I could and would testify competently and truthfully to these matters.
3. I am an investor with Visionary Private Equity Group.
4. I began investing with Visionary Private Equity Group in November 2016, and the total of my investments with Visionary Private Equity Group and its affiliates is \$27,000.
5. I am dissatisfied with the management of Visionary Private Equity Group, based on my own experience.
6. Based on my own experience, and the information contained in the Complaint filed by Plaintiffs in this matter, I support the removal of Dr. Ronald Zamber, Robert Grenley, and Michael Cosby, from their respective positions at Visionary Private Equity Group.
7. I declare under penalty of perjury that the foregoing is true and correct.

Executed on: February 6, 2025



IN THE UNITED STATES DISTRICT COURT
506
FOR THE EASTERN DISTRICT OF MISSOURI

Oliver and Company, et al.,

Plaintiffs,

vs.

CIVIL ACTION NO.

Dr. Ronald Zamber, Michael Cosby, Robert
Grenley, Visionary PE GP I, LLC, Visionary
Private Equity Group I, LP, and Visionary Fund
Manager, LLC,

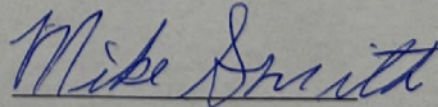
Defendants.

**DECLARATION OF MIKE SMITH IN SUPPORT OF
PLAINTIFFS' MOTION FOR INJUNCTIVE RELIEF**

I, Mike Smith, declare as follow:

1. My name is Mike Smith.
2. I am over the age of 18 and have personal knowledge of the facts described herein. If called as a witness, I could and would testify competently and truthfully to these matters.
3. I am an investor with Visionary Private Equity Group.
4. I began investing with Visionary Private Equity Group in November 2016, and the total of my investments with Visionary Private Equity Group and its affiliates is \$800,000.
5. I am dissatisfied with the management of Visionary Private Equity Group, based on my own experience. I have been invested since 2016, there have been numerous unkept promises of the fund. Closing to new investors, there has only been I distribution in the entire time we have been invested, Rob Grenley has made most of these promises that were never kept. And most of this information was said to have come from Ron Zamber. In 2024 we requested the funds for our required minimum donation, our request was made in November. V-peg did not pay our distribution by December 31st, 2024. They promised that they would pay the RMB plus any penalties leveled by the IRS by January 31st, 2025. They cannot even manage to meet their own set deadline! This dissatisfaction is expressed on behalf of Mike Smith and Bonnie Smith.
6. Based on my own experience, and the information contained in the Complaint filed by Plaintiffs in this matter, I support the removal of Dr. Ronald Zamber, Robert Grenley, and Michael Cosby, from their respective positions at Visionary Private Equity Group.
7. I declare under penalty of perjury that the foregoing is true and correct.

Executed on: February 6, 2025



IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MISSOURI

Oliver and Company, et al.,

Plaintiffs,

vs.

Dr. Ronald Zamber, Michael Cosby, Robert
Grenley, Visionary PE GP I, LLC, Visionary
Private Equity Group I, LP, and Visionary
Fund Manager, LLC,

Defendants.

CIVIL ACTION NO.

**DECLARATION OF JOHN P. SPOSATO IN SUPPORT OF
PLAINTIFFS' MOTION FOR INJUNCTIVE RELIEF**

I, John P. Sposato, declare as follow:

1. My name is John P. Sposato.
2. I am over the age of 18 and have personal knowledge of the facts described herein. If called as a witness, I could and would testify competently and truthfully to these matters.
3. I am an investor with Visionary Private Equity Group.
4. I began investing with Visionary Private Equity Group in 2021, and the total of my investments with Visionary Private Equity Group and its affiliates is \$500,000.00
5. I am dissatisfied with the management of Visionary Private Equity Group, based on my own experience with Ron Zamber and Rob Grenley. They have consistently lied and ghosted me when I made dozens of phone calls and/or sent emails about clarification of statements they made about the value of investments which they misrepresented in my efforts in trying to get my investment returned to me.

6. Rob Grenley promised to return my funds multiple times and lied about raising money from potential investors but that never happened.

7. Ron Zamber lied to me about an arbitrage deal with another company that was making an immediate investment in the Fund where he stated my \$1.00/unit investment was worth \$1.50/unit. The fact is it never took place unless something has changed as of this date. He enticed me to increase my investment from \$100,000.00 to \$500,000.00.

8. In addition, Mr. Zamber used Company funds to pay people he had personal relationships with when they provided no services to the Fund.

9. I was told by employees of the Fund that Mr. Zamber was not paying their salaries therefore limiting information I could receive about the status Fund.

10. Investors were supposed to receive an 8% return on their investment but I never received any interest.

11. We threaten to sue V-Peg if they did not return my money but Mr. Cosby refused to answer any of my Attorneys' calls or emails and ghosted them. I was also told that Michael Cosby told employees not to speak with me, and not to open any mail from me or my Attorney's as he stated, "we will just bleed him with Attorney's fees until he goes away". Ultimately, we filed suit against V-Peg in order to get answers which never came.

12. Based on my own experience, and the information contained in the Complaint filed by Plaintiffs in this matter, I support the removal of Dr. Ronald Zamber, Robert Grenley, and Michael Cosby, from their respective positions at Visionary Private Equity Group.

13. I declare under penalty of perjury that the foregoing is true and correct.

Executed on: February 1, 2025



JOHN P. SPOSATO

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MISSOURI**

Oliver and Company, et al.,

Plaintiffs,

vs.

Dr. Ronald Zamber, Michael Cosby, Robert
Grenley, Visionary PE GP I, LLC, Visionary
Private Equity Group I, LP, and Visionary
Fund Manager, LLC,

Defendants.

CIVIL ACTION NO.

**DECLARATION OF FREDERICK H. STONE IN SUPPORT OF
PLAINTIFFS' MOTION FOR INJUNCTIVE RELIEF**

I, Frederick H. Stone, declare as follow:

1. My name is Frederick H. Stone.
2. I am over the age of 18 and have personal knowledge of the facts described herein. If called as a witness, I could and would testify competently and truthfully to these matters.
3. I am an investor with Visionary Private Equity Group.
4. I began investing with Visionary Private Equity Group in 2021, and the total of my investments with Visionary Private Equity Group and its affiliates is \$50,000.00.
5. I am dissatisfied with the management of Visionary Private Equity Group, based on my own experience. I was told multiple times that liquidity opportunities were going to be presented but never were and at the time of investing I was told that the fund had a sunset date of 2024 as an absolute latest exit ramp. None of these promises or events happened. Furthermore, I was told that the share price would increase from \$1.00 per share. That didn't

ever happen and there is information that suggests shares are being sold at a discount now. I have no faith in the communication, management or leadership of Dr. Ronald Zamber.

5. Based on my own experience, and the information contained in the Complaint filed by Plaintiffs in this matter, I support the removal of Dr. Ronald Zamber, Robert Grenley, and Michael Cosby, from their respective positions at Visionary Private Equity Group.

6. I declare under penalty of perjury that the foregoing is true and correct.

Executed on: February 6, 2025

A handwritten signature in blue ink, appearing to be "C.H.J.", is written over a horizontal line.

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MISSOURI**

Oliver and Company, et al.,

Plaintiffs,

vs.

Dr. Ronald Zamber, Michael Cosby, Robert
Grenley, Visionary PE GP I, LLC, Visionary
Private Equity Group I, LP, and Visionary
Fund Manager, LLC,

Defendants.

CIVIL ACTION NO.

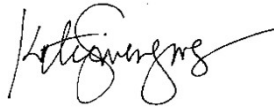
**DECLARATION OF KATIE SWENGROS IN SUPPORT OF
PLAINTIFFS' MOTION FOR INJUNCTIVE RELIEF**

I, Katie Swengros, declare as follow:

1. My name is Katie Swengros.
2. I am over the age of 18 and have personal knowledge of the facts described herein. If called as a witness, I could and would testify competently and truthfully to these matters.
3. I am an investor with Visionary Private Equity Group.
4. I began investing with Visionary Private Equity Group in 2017, and the total of my investments with Visionary Private Equity Group and its affiliates is \$18,000.
5. I am dissatisfied with the management of Visionary Private Equity Group, based on my own experience with the lack of transparency in communications and with the financials of my investment. My loss of confidence in both my investment and the leadership has been growing over the past year and it has been incredibly frustrating.

6. Based on my own experience, and the information contained in the Complaint filed by Plaintiffs in this matter, I support the removal of Dr. Ronald Zamber, Robert Grenley, and Michael Cosby, from their respective positions at Visionary Private Equity Group.

7. I declare under penalty of perjury that the foregoing is true and correct.



Executed on: February 3, 2025

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MISSOURI**

Oliver and Company, et al.,

Plaintiffs,

vs.

Dr. Ronald Zamber, Michael Cosby, Robert
Grenley, Visionary PE GP I, LLC, Visionary
Private Equity Group I, LP, and Visionary
Fund Manager, LLC,

Defendants.

CIVIL ACTION NO.

**DECLARATION OF SCOTT SWENGROS IN SUPPORT OF
PLAINTIFFS' MOTION FOR INJUNCTIVE RELIEF**

I, Scott Swengros, declare as follow:

1. My name is Scott Swengros.
2. I am over the age of 18 and have personal knowledge of the facts described herein. If called as a witness, I could and would testify competently and truthfully to these matters.
3. I am an investor with Visionary Private Equity Group.
4. I began investing with Visionary Private Equity Group in 2017, and the total of my investments with Visionary Private Equity Group and its affiliates is \$30,000.
5. I am dissatisfied with the management of Visionary Private Equity Group, based on my own experience. The VPEG management team has routinely missed all stated goals and dates. Every year we have struggled to initiate and receive our RMD. Communication between management and the investors is almost nonexistent and when we do hear from them it seems to always be a false statement.

6. Based on my own experience, and the information contained in the Complaint filed by Plaintiffs in this matter, I support the removal of Dr. Ronald Zamber, Robert Grenley, and Michael Cosby, from their respective positions at Visionary Private Equity Group.

7. I declare under penalty of perjury that the foregoing is true and correct.

Executed on: February 4, 2025


Scott Swengros

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MISSOURI**

Oliver and Company, et al.,

Plaintiffs,

VS.

Dr. Ronald Zamber, Michael Cosby, Robert
Grenley, Visionary PE GP I, LLC, Visionary
Private Equity Group I, LP, and Visionary
Fund Manager, LLC,

Defendants.

CIVIL ACTION NO.

**DECLARATION OF MARK M. TETTENHORST IN SUPPORT OF
PLAINTIFFS' MOTION FOR INJUNCTIVE RELIEF**

I, Mark M. Tettenhorst, declare as follow:

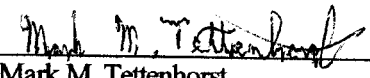
1. My name is **Mark M. Tettenhorst**.
2. I am over the age of 18 and have personal knowledge of the facts described herein. If called as a witness, I could and would testify competently and truthfully to these matters.
3. I am an investor with Visionary Private Equity Group.
4. I began investing with Visionary Private Equity Group in **02/14/2015**, and the total of my investments with Visionary Private Equity Group and its affiliates is **\$ 80,000.00.**
5. I am dissatisfied with the management of Visionary Private Equity Group, based on my own experience. There have been many lies and false promises of dates and times of payment and profits on stocks. I was told when I purchased Navitus Energy Group that there were shares,

warrants, and interest taken away from my \$50,000.00 investment. I understand these statements to be false. These false claims have been going on for years to the present date of 02/07/2025.

6. Based on my own experience, and the information contained in the Complaint filed by Plaintiffs in this matter, I support the removal of Dr. Ronald Zamber, Robert Grenley, and Michael Cosby, from their respective positions at Visionary Private Equity Group.

7. I declare under penalty of perjury that the foregoing is true and correct.

Executed on: February 7, 2025


Mark M. Tettenhorst

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MISSOURI

Oliver and Company, et al.,

Plaintiffs,

vs.

Dr. Ronald Zamber, Michael Cosby, Robert
Grenley, Visionary PE GP I, LLC, Visionary
Private Equity Group I, LP, and Visionary
Fund Manager, LLC,

Defendants.

CIVIL ACTION NO.

**DECLARATION OF RICHARD WALLUT IN SUPPORT OF
PLAINTIFFS' MOTION FOR INJUNCTIVE RELIEF**

I, Richard Wallut, declare as follow:

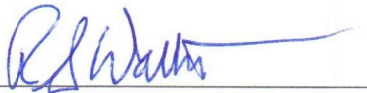
1. My name is Richard Wallut.
2. I am over the age of 18 and have personal knowledge of the facts described herein. If called as a witness, I could and would testify competently and truthfully to these matters.
3. I am an investor with Visionary Private Equity Group.
4. I began investing with Visionary Private Equity Group in 2018, and the total of my investments with Visionary Private Equity Group and its affiliates is \$125,313.
5. I am dissatisfied with the management of Visionary Private Equity Group, based on my own experience.

Overall, the lack of communication and/or any updates is alarming. Investors deserve to know what is happening with their investment. For the 6+ years I have been involved, there have been many promises and projections, and nothing has come to pass.

6. Based on my own experience, and the information contained in the Complaint filed by Plaintiffs in this matter, I support the removal of Dr. Ronald Zamber, Robert Grenley, and Michael Cosby, from their respective positions at Visionary Private Equity Group.

7. I declare under penalty of perjury that the foregoing is true and correct.

Executed on: February 4, 2025

A handwritten signature in blue ink, appearing to read "R. L. Walters", is written over a horizontal line.

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MISSOURI

Oliver and Company, et al.,

Plaintiffs,

vs.

Dr. Ronald Zamber, Michael Cosby, Robert
Grenley, Visionary PE GP I, LLC, Visionary
Private Equity Group I, LP, and Visionary
Fund Manager, LLC,

Defendants.

CIVIL ACTION NO.

**DECLARATION OF PETER WRIGHT IN SUPPORT OF
PLAINTIFFS' MOTION FOR INJUNCTIVE RELIEF**

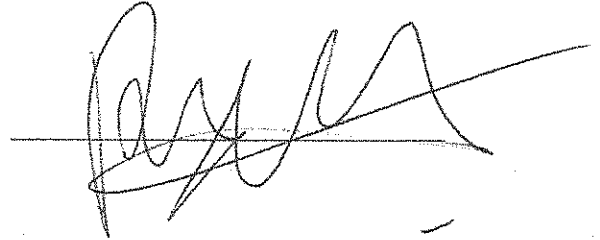
I, Peter Wright, declare as follow:

1. My name is Peter Wright.
2. I am over the age of 18 and have personal knowledge of the facts described herein. If called as a witness, I could and would testify competently and truthfully to these matters.
3. I am an investor with Visionary Private Equity Group.
4. I began investing with Visionary Private Equity Group in 2021, and the total of my investments with Visionary Private Equity Group and its affiliates is \$110,000.
5. I am dissatisfied with the management of Visionary Private Equity Group, based on my own experience with basic follow up, meetings and executive summaries. We have been led to believe that the fund would have numerous liquidity events in the past few years and to-date we have seen none.

6. Based on my own experience, and the information contained in the Complaint filed by Plaintiffs in this matter, I support the removal of Dr. Ronald Zamber, Robert Grenley, and Michael Cosby, from their respective positions at Visionary Private Equity Group.

7. I declare under penalty of perjury that the foregoing is true and correct.

Executed on: February 6, 2025

A handwritten signature in black ink, appearing to be "R. Zamber", written over a horizontal line.